

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS INSTITUTE OF  
TECHNOLOGY,

Plaintiff,

V.

HARMAN INTERNATIONAL INDUSTRIES,  
INCORPORATED,

Defendant.

Civil Action No. 05-10990-DPW

**ASSENTED-TO MOTION TO FILE UNDER  
SEAL THE UNREDACTED VERSION OF HARMAN'S  
RESPONSES TO MIT'S STATEMENTS OF FACT AND REPLIES  
TO MIT'S RESPONSES TO HARMAN'S STATEMENTS OF FACT**

Pursuant to the Parties' Stipulated Protective Order entered by the Court, defendant Harman International Industries, Inc. ("Harman") moves that the Court seal the full version of Harman's Responses to MIT's Statements of Fact and Replies to MIT's Responses to Harman's Statements of Fact until the conclusion of this case. A redacted version of Harman's Responses to MIT's Statements of Fact and Replies to MIT's Responses to Harman's Statements of Fact will be filed electronically and publicly with the Court. This Motion is necessary to comply with the protections of the Stipulated Protective Order.

WHEREFORE, Harman respectfully requests that the Court enter an Order permitting Harman to file under seal the unredacted version of Harman's Responses to MIT's Statements of

Fact and Replies to MIT's Responses to Harman's Statements of Fact.

Date: September 26, 2007

Respectfully submitted,

/s/ Courtney A. Clark

Robert J. Muldoon, Jr., BBO# 359480  
Courtney A. Clark, BBO# 651381  
SHERIN AND LODGEN, LLP  
101 Federal Street  
Boston, MA 02110

William A. Streff, Jr., P.C.  
Michelle A.H. Francis  
Craig D. Leavell  
Jamal M. Edwards  
Colleen M. Garlington  
Joanna Belle Gunderson  
KIRKLAND & ELLIS LLP  
200 East Randolph Drive  
Chicago, IL 60601  
(312) 861-2000 (phone)  
(312) 861-2200 (fax)

*Attorneys for Defendant  
Harman International Industries, Incorporated*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

Harman, by and through its attorneys, hereby certifies that it conferred with MIT's counsel on September 26, 2007, and counsel for MIT has assented to this Motion.

/s/ Courtney A. Clark

Courtney A. Clark

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on September 26, 2007.

/s/ Courtney A. Clark

Courtney A. Clark